

# EXHIBIT E

1

2 UNITED STATES DISTRICT COURT  
3 EASTERN DISTRICT OF NEW YORK

-----X

4 MOSHE SAPERSTEIN; RACHEL SAPERSTEIN;  
5 AVI ITZHAK SAPERSTEIN; TAMAR SAPERSTEIN;  
6 DAFNA SAPERSTEIN; the ESTATE of  
7 AHUVA AMERGI, by and through RAFI AMERGI,  
As Administrator, Executor and/or Personal  
Representative, RAFI AMERGI, individually,  
minor; and EFRAIM AMERGI, minor; DAN  
DAVIDOVIC; JUDITH DAVIDOVIC; ELIEZER  
DAVIDOVIC; ARIEL DAVIDOVIC; and  
8 SARAH ZWEIG,

9 PLAINTIFFS,

10 -against- Case No:  
11 04-CV-20225

12 THE PALESTINIAN AUTHORITY; THE PALESTINE  
13 LIBERATION ORGANIZATION; THE PALESTINIAN  
PREVENTATIVE SECURITY SERVICES; THE ESTATE  
OF YASSER ARAFAT; YASSER MAHMUD ALKATIVE;  
NIZHAR D'HLIS; and NAIM MUTZRAN,

14 DEFENDANTS.

15 -----X

16 DATE: April 1, 2009  
TIME: 12:19 p.m.

17

18 TRANSCRIPTION OF AUDIO CD OF  
19 DEPOSITION of the Defendant, THE  
20 PALESTINIAN AUTHORITY, by a Witness,  
21 HUSSEIN AL SHEIKH, held in Jerusalem,  
22 Israel.

23

24

25

1 HUSSEIN AL SHEIKH  
2 Saperstein; the translator Amal  
3 Shehadeh; the audio-video team Miri  
4 Aharon, Shimon Ben Avi.

5 H U S S E I N A L S H E I K H, called  
6 as a witness, having been first duly sworn  
7 by the Commissioner, was examined and  
8 testified as follows:

9 EXAMINATION BY

10 MR. TOLCHIN:

11 Q. Please state your name for the  
12 record.

13 A. Hussein Al Sheikh.

14 Q. Sir, did you show any form of  
15 identification to the Commissioner?

16 A. (Translator.) To who?

17 Q. To the Commissioner.

18 A. (Translator.) All of my  
19 identification is with the lawyer.

20 Q. Which lawyer?

21 A. (Translator.) Osama Saadi.

22 Q. You gave your identification to  
23 your lawyer?

24 A. (Translator.) Of course.

25 Q. Do you generally have your

1 HUSSEIN AL SHEIKH

2 A. (Translator.) Before I was in  
3 prison I was a member of Fatah.

4 Q. How old were you when you  
5 became a member of Fatah?

6 A. (Translator.) Sixteen and a  
7 half.

8 Q. You testified earlier that you  
9 were in prison because you were a member of  
10 the PLO. Is that what you said?

11 A. (Translator.) Fatah is part of  
12 the PLO.

13 Q. Is there such a thing as being  
14 a member of the PLO itself?

15 A. (Translator.) Once you are a  
16 member of Fatah, you immediately become a  
17 member of the PLO.

18 Q. Is it possible to be a member  
19 of the PLO without being a member of a  
20 constituent group?

21 A. (Translator.) Yes, you can be  
22 an independent.

23 Q. But you became a member of the  
24 PLO by virtually being a member of Fatah  
25 since the age 16 1/2?

1 HUSSEIN AL SHEIKH

2 BY MR. TOLCHIN:

3 Q. Can you tell me, sir, when  
4 exactly you were elected as Secretary of  
5 Fatah?

6 A. (Translator.) In the last  
7 months of 1999.

8 Q. At the time that you were  
9 elected as Secretary of Fatah, did you stop  
10 having a job working for the Palestinian  
11 Authority?

12 A. (Translator interpreted  
13 question.)

14 Q. I'll rephrase the question.  
15 I'll just withdraw the question and ask it  
16 more clearly.

17 When you became Secretary of  
18 Fatah, did you stop being employed by the  
19 Palestinian Authority?

20 A. (Translator.) Yes. When I was  
21 elected, I no longer had any executive  
22 position at the Palestinian Authority.

23 Q. The job as Secretary of Fatah,  
24 was that a volunteer job or were you paid a  
25 salary for that job?

1 HUSSEIN AL SHEIKH

2 he went.

3 MR. TOLCHIN: He went to call  
4 someone. He was talking on his  
5 cellphone.

6 MR. HIBEY: Oh, is that right?

7 MR. SAADI: It's GPC, General  
8 Personnel Council.

9 Q. During the time that you worked  
10 as Secretary of Fatah, you were paid a  
11 salary by the General Personnel Council of  
12 the PA; is that correct?

13 A. (Translator.) Correct.

14 Q. Why did the Palestinian  
15 Authority continue to pay you a salary  
16 while you were working as Secretary of  
17 Fatah?

18 A. (Translator.) I was working  
19 for the Palestinian Authority until 1999.  
20 When I finished and was elected as the  
21 Secretary of Fatah, I lost my executive  
22 position in the PA, so my portfolio was  
23 transferred from my executive position to  
24 the GPC.

25 I was given a limited period.

1 HUSSEIN AL SHEIKH  
2 was no longer stable. Different  
3 organizations were not working or active as  
4 they used to be before the Intifada. The  
5 working hours were not regulated anymore.  
6 This is what I mean specifically.

7 MR. SAADI: Mr. Hussein was  
8 referring to the Department of  
9 General Personnel Affairs, we call it  
10 GPC. The General Personnel Council,  
11 that it is where public servants are  
12 usually paid.

13 Q. How long did you serve as  
14 Secretary of Fatah?

15 A. (Translator.) I took this  
16 position from 1999 until 2005.

17 Q. For what period of time did you  
18 continue to receive a salary from the GPC?

19 A. (Translator.) During the whole  
20 five years, except for one year during the  
21 government of Hamas, following the victory  
22 of Hamas in the elections. I assume about  
23 a year I did not have a salary.

24 Q. Do you know what year that was?

25 A. (Translator.) Hamas succeeded

1 HUSSEIN AL SHEIKH

2 Q. Sir, during the break, did you  
3 have an opportunity to verify the website  
4 address of the Civil Affairs Authority?

5 A. (Translator.) Yes.

6 Q. What is the website address?

7 MR. SAADI: It is  
8 www.mca.gov.ps.

9 Q. That is the website that we  
10 discussed earlier that Mr. Abu Jundi  
11 supervises on behalf of your authority?

12 A. (Translator.) Yes.

13 Q. Sir, you were a member of Fatah  
14 for approximately the last 33 years; is  
15 that correct?

16 A. (Translator.) Approximately,  
17 yes.

18 Q. Other than the position that  
19 you were elected to as Secretary of Fatah  
20 from 1999 to 2005, have you ever held any  
21 other positions within Fatah?

22 A. (Translator.) No, only this  
23 position.

24 Q. I'm referring specifically to  
25 the period of 2000 to 2004. Spanning that

1 HUSSEIN AL SHEIKH

2 period of years, can you explain to me what  
3 was the organizational structure of Fatah?

4 A. (Translator.) We had a general  
5 commander Yasser Arafat. Beneath it the  
6 Central Committee, beneath it the  
7 Revolutionary Council, and beneath it the  
8 leadership in the West Bank and the  
9 leadership of Gaza. And then comes the  
10 leadership of Fatah in the different areas.  
11 This is the structure.

12 Q. When you referred to the  
13 Central Committee, who were the members of  
14 the Central Committee? And all these  
15 questions are about the period of 2000 to  
16 2004. And I just want to say that if it  
17 changed during that period, you can tell me  
18 that. I'm not trying to put words in your  
19 mouth.

20 A. (Translator.) Nothing is  
21 secretive about it. Yasser Arafat was.

22 Q. He was both the general  
23 commander and a member of the Central  
24 Committee?

25 A. (Translator.) Yes, of course.

1 HUSSEIN AL SHEIKH

2 in the West Bank, comprising 70 people, it  
3 is the same thing as the High Committee for  
4 Fatah in the West Bank?

5 A. (Translator.) Correct.

6 Q. Thank you.

7 Did Fatah have a Treasurer  
8 between 2000 and 2004?

9 A. (Translator.) What do you mean  
10 Treasurer?

11 Q. Let me back up. Did Fatah have  
12 a budget between 2000 and 2004?

13 A. (Translator.) Of course.

14 Q. What was the source of the  
15 money that was used for Fatah's budget?

16 A. (Translator.) I do not know.  
17 This is not my field -- it is not my  
18 expertise.

19 Q. Who was in charge of  
20 supervising Fatah's money?

21 A. (Translator.) Achmed Qurei.

22 Q. Did Mr. Qurei have a title that  
23 had something to do with his function of  
24 supervising the money of Fatah?

25 A. (Translator.) He is a member

1 HUSSEIN AL SHEIKH

2 of the Central Committee in Fatah, and he  
3 is responsible for the finance of Fatah.

4 Q. Was he elected to that  
5 position? How did he get that  
6 responsibility?

7 A. (Translator.) He was elected  
8 in the conference of 1989.

9 Q. Is he known by any nicknames or  
10 noms de guerre?

11 A. (Translator.) He is known for  
12 Abu Ala, who was previously negotiating  
13 with Tzipi Livni.

14 Q. What is Mr. Qurei's job today?

15 A. (Translator.) He is a member  
16 of the Central Committee and the head of  
17 Palestinian Negotiation Delegation with  
18 Israel.

19 Q. He is a member of the Central  
20 Committee of Fatah?

21 A. (Translator.) Correct.

22 Q. He is also employed by the  
23 Palestinian Authority?

24 A. (Translator.) He has nothing  
25 to do with the PA. He belongs only to the

1 HUSSEIN AL SHEIKH

2 Abbas Zaki; he is responsible of the  
3 Palestinian portfolio in Lebanon, et  
4 cetera.

5 Q. I just want to clarify about  
6 Mr. Kadoumi. You said he has a problem,  
7 but does he have a portfolio?

8 A. (Translator.) Currently he is  
9 carrying no official portfolio.

10 Q. How well did you know Yasser  
11 Arafat?

12 A. (Translator.) Good.

13 Q. Did you consider him a friend,  
14 or just somebody you knew from work, or  
15 something else?

16 A. (Translator.) I considered him  
17 a leader and responsible.

18 Q. In the period of 2000 to 2004,  
19 did you meet with Mr. Arafat?

20 A. (Translator.) Of course.

21 Q. How often?

22 A. (Translator.) Hundreds of  
23 times.

24 Q. Was that for social purposes or  
25 business purposes?

1 HUSSEIN AL SHEIKH

2 A. (Translator.) Things which are  
3 connected to Fatah.

4 Q. Did you receive directives or  
5 instructions from Mr. Arafat during that  
6 period?

7 A. (Translator.) Instructions in  
8 what field?

9 Q. Anything connected to Fatah.

10 A. (Translator.) I used to  
11 receive daily instructions from him.

12 Q. Was that verbally or in  
13 writing?

14 A. (Translator.) Mostly verbally.

15 Q. Did you ever receive written  
16 instructions from him?

17 A. (Translator.) In what field?

18 Q. Something connected with Fatah.

19 A. (Translator.) Of course, but I  
20 cannot remember what was verbally and what  
21 was written.

22 Q. Did you ever write to Mr.  
23 Arafat about anything?

24 A. (Translator.) Hundreds of  
25 letters.

1 HUSSEIN AL SHEIKH

2 Q. What types of issues would you  
3 have written to Mr. Arafat, and I'm talking  
4 about 2000 to 2004.

5 A. (Translator.) I used to write  
6 him for giving medical treatment for  
7 families who cannot afford it, for their  
8 children. I used to ask him for assistance  
9 and help for students who are in need so  
10 they can go for studies, and also social  
11 assistance for deprived families.

12 Q. Why would you write those  
13 letters to Mr. Arafat and not to Mr. Qurei  
14 who you told us handled the finances?

15 A. (Translator.) I was not the  
16 one who determined where it should be  
17 directed. The one who determined that was  
18 Yasser Arafat, who was the Commander.  
19 Because Abu Ala does not have a direct  
20 responsibility upon me, Abu Amar had direct  
21 responsibility upon me.

22 Q. Let me clarify. Is it fair to  
23 say that if you felt that a particular  
24 student should receive financial aid, you  
25 would have written to Mr. Arafat, asking to

1 HUSSEIN AL SHEIKH

2 give money to this student, and if Mr.  
3 Arafat agreed, he asked Mr. Qurei to  
4 disburse the money?

5 A. (Translator.) Not necessarily  
6 from Qurei. The one who determined from  
7 whom to receive the money, that was Yasser  
8 Arafat.

9 Q. Let me break it down. You  
10 would ask Mr. Arafat to give money to Mr.  
11 X, and if Mr. Arafat agreed, he would  
12 direct somebody, he would pick to disburse  
13 the money?

14 A. (Translator.) Correct.

15 Q. And what we are talking about  
16 is the money of Fatah. We are not talking  
17 about the Palestinian Authority or PLO?

18 A. (Translator.) Fatah and PLO  
19 are the same because the Fatah and the PLO  
20 budget are with Arafat.

21 Q. During the period of 2000 to  
22 2004, who directed the budget of the PA?

23 A. (Translator.) Do you mean the  
24 Minister of Finance?

25 Q. I don't mean any particular

1 HUSSEIN AL SHEIKH

2 person. I am asking you.

3 A. (Translator.) What do you mean  
4 the money of PA?

5 Q. I will clarify. In the period  
6 2000 to 2004, who was in charge of making  
7 decisions of spending the money of the PA?

8 A. (Translator.) Again I cannot  
9 understand the question. It is not clear  
10 enough. In the PA there is a Minister of  
11 Finance. If I am not mistaken, I think it  
12 was Salam Fayad, if this is what you mean  
13 by your question. And who determines the  
14 financial policy is Salam Fayad.

15 Q. What was Yasser Arafat's role  
16 in the PA between 2000 and 2004?

17 A. (Translator.) Do you mean his  
18 status or his capacity in the PA?

19 Q. Yes.

20 A. (Translator.) At that time he  
21 was the head of the PA and the PLO.

22 Q. He was the President and the  
23 Prime Minister?

24 A. (Translator.) The President  
25 and the Prime Minister at the same time.

1 HUSSEIN AL SHEIKH

2 Q. Did he hold any other positions  
3 besides the President and the Prime  
4 Minister?

5 A. (Translator.) In government?

6 Q. In the PA government.

7 A. (Translator.) This is what I  
8 remember were the official capacities of  
9 Yasser Arafat. Previously, before 2000, he  
10 used to take the capacity of Interior  
11 Minister sometimes, but I cannot remember  
12 at what periods.

13 Q. As President and Prime Minister  
14 of the Palestinian Authority, between 2000  
15 and 2004, did Yasser Arafat have any  
16 authority over expenditures of the  
17 Palestinian Authority?

18 A. (Translator.) Of course, he  
19 was the President.

20 Q. You told us, sir, that you  
21 would often write letters to Mr. Arafat  
22 asking him to award money from Fatah to  
23 particular people.

24 A. (Translator.) Correct.

25 Q. Do you have any idea, sir, how

1 HUSSEIN AL SHEIKH

2 much money was awarded by Fatah altogether  
3 as a result of your requests?

4 A. (Translator.) I cannot count  
5 them.

6 Q. Can you give it in order of  
7 magnitude? Are we talking hundreds of  
8 dollars, thousand of dollars, hundreds of  
9 thousands of dollars?

10 A. (Translator.) I would say  
11 hundreds of thousands of dollars.

12 Q. Do you have any idea what the  
13 annual expenses of Fatah were during the  
14 period of 2000 to 2004?

15 A. (Translator.) No, it is not  
16 part of my expertise.

17 Q. Are you familiar with an  
18 individual named Mohammed Rashid?

19 A. (Translator.) Of course.

20 Q. Who is Mohammed Rashid?

21 A. (Translator.) He was  
22 responsible for the investment fund.

23 Q. What investment fund?

24 A. (Translator.) I have no idea  
25 about it.

1 HUSSEIN AL SHEIKH

2 A. (Translator.) Yes, of course.

3 In all the area of the West Bank and in the  
4 Gaza Strip.

5 Q. Did Fatah have a main office?

6 A. (Translator.) Yes, of course.

7 Q. Where was the main office of  
8 Fatah?

9 A. (Translator.) The headquarters  
10 was where Yasser Arafat was, because he is  
11 the General Commander of the movement.

12 Q. Was that location known as the  
13 Mukata?

14 A. (Translator.) Correct.

15 Q. So the Mukata was where the  
16 main office of Fatah was located?

17 A. (Translator.) There are  
18 others.

19 Q. There are other what?

20 A. (Translator.) There are other  
21 offices.

22 Q. Other main offices?

23 A. (Translator.) For instance,  
24 Abu Ala also had a main office as well as  
25 Hakam Balaui also had a main office. Also,

1 HUSSEIN AL SHEIKH

2 Abdallah el Franji had an office for  
3 external relations. The headquarters of  
4 the head command since Abu Amar was the  
5 General Commander was at the Makata.

6 Q. Is it correct that the Mukata  
7 was also the main office of the PA?

8 A. (Translator.) Of course, since  
9 the PA was also Yasser Arafat.

10 Q. Was the Mukata also the main  
11 office of the PLO?

12 A. (Translator.) Correct, since  
13 Yasser Arafat was also the head of the  
14 Executive Committee of the PLO.

15 Q. We are talking about 2000 to  
16 2004?

17 A. (Translator.) Correct.

18 Q. You mentioned that there were  
19 some other main offices of Fatah. Did you  
20 say, sir, that there were other main  
21 offices of Fatah?

22 MR. McALEER: Object to the  
23 form.

24 A. (Translator.) Correct.

25 Q. Were those other main offices

1 HUSSEIN AL SHEIKH

2 objected to it?

3 A. (Translator.) Who opposed?

4 Q. Anybody.

5 A. (Translator.) If it is  
6 security issue, then it derives or obeys  
7 the security system, if they were requested  
8 to return, then they will return.

9 Q. This is for the Commissioner.

10 This is Exhibit 4.

11 (Whereupon, the aforementioned  
12 document was marked as Plaintiff's  
13 Exhibit 4 for identification as of  
14 this date by the Commissioner.)

15 Q. First of all, is this a  
16 document you have ever seen before, sir?

17 A. (Translator.) No, I do not  
18 recall seeing it.

19 Q. At the top in the upper  
20 right-hand corner there is a handwritten  
21 comment there. Are you able to read that?

22 A. (Translator.) Yes, of course.

23 Q. What does it say?

24 A. (Translator.) It should be  
25 sent to the District of Ramalla to Hussein

1 HUSSEIN AL SHEIKH

2 systems are sending a warning to all those  
3 who were not returning that they might be  
4 sacked from work. This is my  
5 interpretation.

6 Q. Do you recall the situation?

7 A. (Translator.) I do not  
8 remember particularly the circumstances  
9 here.

10 Q. You can give the original  
11 document to the Commissioner. I may ask  
12 you, sir, if this is a document you have  
13 ever seen.

14 A. (Translator.) Yes.

15 Q. What is this document?

16 A. (Translator.) I presented this  
17 to Yasser Arafat, financial aid for certain  
18 people.

19 Q. Did you write this document?

20 A. (Translator.) Yes.

21 Q. Is all of this document yours,  
22 or is there a part that was written by  
23 somebody else?

24 A. (Translator.) This is my  
25 handwriting, and the handwriting of Yasser

1 HUSSEIN AL SHEIKH

2 Arafat.

3 Q. Is it accurate that the  
4 handwriting which is horizontal is yours  
5 and the handwriting which is diagonal is  
6 Mr. Arafat's?

7 A. (Translator.) This is an area  
8 with the handwriting where the date is  
9 stated and the signature, this is of Yasser  
10 Arafat.

11 MR. TOLCHIN: Can we agree, Mr.  
12 Hibey, that the witness is indicating  
13 that the diagonal handwriting towards  
14 the lower left as being Mr. Arafat's?

15 MR. HIBEY: Yes.

16 Q. What did you write in this  
17 letter?

18 A. (Translator.) I requested from  
19 Abu Amar to allocate money for three  
20 people.

21 Q. Just for the sake of the  
22 record, and since it's your handwriting,  
23 could you read the letter slowly and let  
24 the translator translate?

25 A. (Translator.) Of course. "Mr.

1 HUSSEIN AL SHEIKH

2 President, the warrior of combatant,  
3 President of combatant."

4 MR. SAADI: No, no, fight is --  
5 (Arabic) This (word) is someone who  
6 declares Jihad because of unjust  
7 conditions.

8 MR. SHEHADEH: It can be both a  
9 fighter and a combatant.

10 MR. TOLCHIN: What is the  
11 Arabic word we are talking about?

12 MR. SHEHADEH: Mujahed.

13 A. (Translator.) I would like to  
14 explain. To assert that Mujahed is not a  
15 fighter, if we want to take the linguistic  
16 phrase, you can make Jihad through talking.

17 Q. But the word is connected to  
18 the root Jihad. Can I make a suggestion;  
19 let the Interpreter say what she thinks,  
20 you say what you think, and then we'll ask  
21 the witness to clarify and then we'll have  
22 it on the record.

23 A. (Translator.) I have not  
24 finished yet. I would like to clarify.  
25 Mujahed does not mean in any way combatant

1                           HUSSEIN AL SHEIKH  
2     or fighter. Because, according to Islam,  
3     Mujahed means that you can do Jihad through  
4     your words and there is an internal thing  
5     within your soul, the Jihad of your soul.  
6     What is the Jihad of the soul? That means  
7     do not commit adultery, do not steal, and  
8     such things. Therefore Mujahed does not  
9     necessarily mean a fighter.

10               Q.     Would you agree that Mujahed  
11               can mean fighter?

12               A.     (Translator.) Each person can  
13               interpret it as he sees fit.

14               Q.     Just finish the letter, please.

15               A.     (Translator.) (Reading.) My  
16               brother Abu Amar, may God protect you and  
17               keep you well. I grant you with the salute  
18               of homeland and nation. We request from  
19               you Highness to be kind and to allocate a  
20               financial amount of two thousand five  
21               hundred dollars to the brothers number 1,  
22               Raid ed Karmi, second Ziad Machmud Daas,  
23               third Omar Kahaden, and we leave this to  
24               your decision, your son Hussein al Sheikh.  
25               The thing that was offered Yasser Arafat,

1 HUSSEIN AL SHEIKH

2 the Finance Ministry in Ramallah, the  
3 allocation of six hundred dollars would be  
4 given to each person.

5 Q. Who is Raid ed Karmi?

6 A. (Translator.) Raid el Karmi is  
7 a person from the Tul Karem area.

8 Q. Why did you want to allocate  
9 2500 dollars to Mr. El Karmi?

10 A. (Translator.) These were the  
11 recommendations of the responsible in  
12 charge person of Fatah in Tul Karem area,  
13 since I do not know any of these three  
14 people personally. I am given  
15 recommendations from the different Fatah  
16 representatives in these area within my  
17 capacity of the Secretary of Fatah I report  
18 this to Yasser Arafat within the framework  
19 of the Humanitarian Aid. And I have  
20 brought thousands of humanitarian aid to  
21 people.

22 Q. Who asked you or who  
23 recommended to you that you request 2500  
24 dollars for Mr. El Karmi?

25 A. (Translator.) If I am not

1 HUSSEIN AL SHEIKH

2 mistaken, the Secretary of the area of Tul  
3 Karem. What period are we talking about?  
4 2001? I cannot see the date.

5 Q. 2001.

6 A. (Translator.) I think that the  
7 Secretary, maybe it was Dr. Thabet or Fayet  
8 Kanaan. I am not certain who it was, but I  
9 am sure one of them was the Secretary at  
10 the time.

11 Q. Who is Fayed Kanaan?

12 A. (Translator.) The Secretary of  
13 Tul Karem area at that time, maybe. I do  
14 not recall if it was Dr. Thabet or Fayet  
15 Kanaan.

16 Q. Who is Amar Kadan?

17 A. (Translator.) I do not know  
18 him.

19 Q. Are you familiar with something  
20 called Force 17?

21 A. (Translator.) Of course I am.

22 Q. Was Mr. Kadan connected somehow  
23 to Force 17?

24 A. (Translator.) Surely.

25 Q. Briefly what is Force 17?

1 HUSSEIN AL SHEIKH

2 A. (Translator.) It is the  
3 Private Presidential Guard.

4 MR. TOLCHIN: This goes to the  
5 commission, 6.

6 (Whereupon, the aforementioned  
7 document was marked as Plaintiff's  
8 Exhibit 6 for identification as of  
9 this date by the Commissioner.)

10 Q. Sir, is this a document that  
11 you have ever seen before?

12 A. (Translator.) No, of course  
13 not.

14 Q. Did you review this document  
15 before you came here today in preparation  
16 for the deposition?

17 A. (Translator.) Yes, I saw it by  
18 the lawyers.

19 Q. Take a moment to read it. Who  
20 wrote this document? Who signed it?

21 A. (Translator.) According to  
22 what I see, the one who signed it is Fayed  
23 Kanaan.

24 Q. The same individual that we  
25 spoke about a minute ago?

1 HUSSEIN AL SHEIKH

2 A. (Translator.) Yes, for sure.

3 Q. Where is Fayed Kanaan today?

4 A. (Translator.) I do not know.

5 This is a period between 2001 and 2009,  
6 eight years, maybe in Tul Karem.

7 Q. Is he employed by the  
8 Palestinian Authority today?

9 A. (Translator.) I do not know.

10 Q. Do you know if he's still alive  
11 today?

12 A. (Translator.) Of course. If  
13 he would have passed away, I would have  
14 known about it.

15 Q. The diagonal writing on the  
16 left, is that Mr. Arafat's writing?

17 A. (Translator.) The diagonal  
18 handwriting on the left is the writing of  
19 Yasser Arafat.

20 Q. There is a list of 15 names.

21 Do you recognize any of these names?

22 A. (Translator.) Not one of them.

23 Q. Are you familiar with an  
24 individual named Wafa Idris?

25 A. (Translator.) I do not know